

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON HAMMONDS, BRENDA F. WATKINS, LIMESTONE UNIVERSITY, MG FREESITES, LTD., d/b/a PORNHUB.COM, MG FREESITES II LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC., MG BILLING LTD., and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM, TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**TRAFFICSTARS, LTD.'S MOTION TO
DISMISS PURSUANT TO FRCP 12(b)(2)
and 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), Defendant TraficcStars, Ltd. ("TL") respectfully moves for the Court to dismiss Plaintiffs' Fifth Amended Complaint ("FAC") as it applies to TL because: (a) the Court lacks personal jurisdiction over TL, a foreign company incorporated in Cyprus with a principal place of business in Limassol, Cyprus; and (b) the FAC fails to state a claim upon which relief may be granted.

In support of this Motion, TL relies on the accompanying Memorandum of Law.

Respectfully Submitted,

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